

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ROME DIVISION

EARL PARRIS, JR., individually, and  
on behalf of a Class of persons similarly  
situated,

*Plaintiff,*

CITY OF SUMMERVILLE,  
GEORGIA,

*Intervenor-Plaintiff,*

v.

3M COMPANY, et al.,

*Defendants.*

Civil Action No.

4:21-cv-40-TWT

**JOINT MOTION FOR ENTRY OF A STIPULATED CONFIDENTIALITY  
AGREEMENT AND PROTECTIVE ORDER**

Plaintiff Earl Parris, Jr. (“Plaintiff”), Intervenor-Plaintiff City of Summerville (“Intervenor”), Defendant 3M Company (“3M”), Defendant Daikin America, Inc. (“Daikin”), Defendant Huntsman International LLC (“Huntsman”), Defendant Pulcra Chemicals, LLC (“Pulcra”), Defendant Mount Vernon Mills, Inc. (“MVM”), and Defendant Town of Trion, Georgia (“Town of Trion”) (collectively,

“Defendants”) (altogether, “Parties”) by and through their attorneys, hereby move the Court for entry of the Agreed Protective Order, attached as Exhibit A.

The Parties have conferred and agree upon the terms of the Agreed Protective Order in order to protect proprietary and confidential information contained in certain documents that may be produced during discovery in this matter. Accordingly, the Parties respectfully Request that the Court enter the Agreed Protective Order, attached as Exhibit A.

Respectfully submitted this the 30<sup>th</sup> of August, 2022.

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### **CERTIFICATE OF COMPLIANCE**

Pursuant to Northern District of Georgia Civil Local Rule 7.1.D., the undersigned counsel certifies that the foregoing filing is prepared in Times New Roman 14-point font, as mandated in Local Rule 5.1.C.

**CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing **JOINT MOTION FOR ENTRY OF A STIPULATED CONFIDENTIALITY AGREEMENT AND PROTECTIVE ORDER** has been filed electronically with the Clerk of Court by using the CM/ECF system which will automatically email all counsel of record.

This the 30<sup>th</sup> day of August, 2022.

/s James S. Whitlock